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On Behalf Of The Holders Of The Asset Backed Securities
Corporation Home Equity Loan Trust, Series NC 2006-He4
Asset Backed Pass-Through Certificates, Series NC 2006-He4

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE:

CASE NO. 23-42283-mxm13
CHAPTER 13

Sherry Lynn Francis
Debtor.

OBJECTION TO CONFIRMATION OF
DEBTOR'S CHAPTER 13 PLAN
[Ref. Doc. # 10]

TO THE HONORABLE JUDGE OF SAID COURT:

U.S. Bank National Association, As Trustee, On Behalf Of The Holders Of The Asset Backed Securities Corporation Home Equity Loan Trust, Series NC 2006-HE4 Asset Backed Pass-Through Certificates, Series NC 2006-HE4, ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan, and states as follows:

1. Debtor, Sherry Lynn Francis, ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on August 1, 2023.
2. Secured Creditor holds a security interest in the Debtor's real property located at 6519 Blackberry Dr, Arlington, TX 76016 (the "Property").
3. The Debtor filed a Chapter 13 Plan on August 15, 2023 (the "Plan"). [Doc. #10]

4. The Plan includes payments toward the Note and Mortgage with Secured Creditor, however the figures used by the Debtor are inaccurate. Secured Creditor's estimated pre-petition arrearage claim is \$35,639.92, whereas the Plan proposes to pay only \$30,725.00. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed. Secured Creditor objects to any plan which proposes to pay it anything less than \$35,639.92 as the pre-petition arrearage over the life of the plan.

WHEREFORE, PREMISES CONSIDERED, Secured Creditor respectfully requests that the Court sustain the objections stated herein, deny confirmation of Debtor's Plan, and grant Secured Creditor such other and further relief as the Court deems just and proper.

Dated: September 5, 2023

Respectfully submitted by:

/s/ George Dunn

George Dunn

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Partners, PLLC**

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**Attorneys for U.S. Bank National Association,
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Equity Loan Trust, Series NC 2006-HE4 Asset
Backed Pass-Through Certificates, Series NC
2006-HE4**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 5, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and caused a true and correct copy to be served via CM/ECF or United States Mail to the following parties:

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Backed Pass-Through Certificates, Series
NC 2006-HE4**

By: /s/George Dunn